

1 THOMAS ERICSSON, ESQ.  
2 Nevada Bar No. 4982  
3 RACHAEL E. STEWART, ESQ.  
4 Nevada Bar No. 14122  
5 1050 Indigo Drive, Suite 120  
6 Las Vegas, Nevada 89145  
7 Telephone: (702) 878-2889  
8 Facsimile: (702) 522-1542  
9 [tom@oronozlawyers.com](mailto:tom@oronozlawyers.com)  
10 *Attorneys for Defendant Kevin Stubbs*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 vs.  
16 KEVIN STUBBS,  
17 Defendant.

CASE NO.: 2:19-CR-00142-APG-DJA

**STIPULATION TO EXTEND TIME  
TO FILE OBJECTIONS TO ORDER  
DENYING MOTION TO COMPEL  
DISCOVERY (Dkt. 66)**

(First Request)

18 IT IS HEREBY STIPULATED AND AGREED by Defendant Keven Stubbs, by and  
19 through his attorney, THOMAS A. ERICSSON, ESQ., and the United States of America, by  
20 and through TONY LOPEZ, ESQ., and JAMIE MICKELSON, ESQ., Assistant United States  
21 Attorneys, that the date for the defendant to file Objections to the Order denying Defendant's  
22 Motion to Compel Discovery (Dkt. 66) be extended up to and including January 9, 2020.

23 The request for a continuance is based upon the following:

- 24 1. Counsel for the Defendant requires additional time to finalize his Objections to  
25 the Order denying Defendant's Motion to Compel Discovery in order to  
26 properly present the issues to the Court and due to Counsel's congested hearing  
27 schedule.
- 28 2. Defendant Stubbs is currently in custody and has no objection to the  
continuance.

1  
2 3. Defense counsel has spoken to Assistant United States Attorney Tony Lopez  
3 and he has no objection to the extension until January 9, 2020, for the filing of  
4 the Objections.

5 4. The additional time requested herein is not sought for purposes of delay.  
6

7 5. Denial of this request for an extension would deny counsel for the defendant  
8 sufficient time to effectively and thoroughly prepare and submit Objections,  
9 taking into account the exercise of due diligence.

10 6. Additionally, denial of this request for continuance could result in a miscarriage  
11 of justice.  
12

13 This is the first request to extend the time to file the Objections.

14 DATED: January 7, 2020

15 Respectfully submitted,  
16

17 /s/ Thomas A. Ericsson  
18 Thomas A. Ericsson, Esq.  
19 Oronoz & Ericsson, LLC  
20 1050 Indigo Drive, Suite 120  
21 Las Vegas, Nevada, 89145  
22 Attorney for Defendant  
23  
24  
25  
26  
27  
28

/s/ Tony Lopez  
Tony Lopez, Esq.  
Jamie Mickelson, Esq.  
501 Las Vegas Boulevard, South, Suite 1100  
Las Vegas, Nevada, 89101  
Attorneys for the United States of America

1 THOMAS ERICSSON, ESQ.  
2 Nevada Bar No. 4982  
3 RACHAEL E. STEWART, ESQ.  
4 Nevada Bar No. 14122  
5 1050 Indigo Drive, Suite 120  
6 Las Vegas, Nevada 89145  
7 Telephone: (702) 878-2889  
8 Facsimile: (702) 522-1542  
9 [tom@oronozlawyers.com](mailto:tom@oronozlawyers.com)  
10 *Attorneys for Defendant Kevin Stubbs*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 vs.  
16 KEVIN STUBBS,  
17 Defendant.

CASE NO.: 2:19-CR-00142-APG-DJA

18 **FINDINGS OF FACT**

19 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
20 Court finds:

- 21 1. Counsel for the Defendant requires additional time to finalize his Objections to  
22 the Order denying Defendant's Motion to Compel Discovery in order to  
23 properly present the issues to the Court and due to Counsel's congested hearing  
24 schedule.
- 25 2. Defendant Stubbs is currently in custody and has no objection to the  
26 continuance.
- 27 3. Defense counsel has spoken to Assistant United States Attorney Tony Lopez  
28 and he has no objection to the extension until January 9, 2020, for the filing of  
the Objections.

- 1
- 2
- 3
4. The additional time requested herein is not sought for purposes of delay.
- 4
- 5
- 6
5. Denial of this request for an extension would deny counsel for the defendant sufficient time to effectively and thoroughly prepare and submit Objections, taking into account the exercise of due diligence.
- 7
- 8
6. Additionally, denial of this request for continuance could result in a miscarriage of justice.
- 9

10 **CONCLUSION OF LAW**

11 Based on the pending stipulation of the parties, and good cause appearing, the stipulation is hereby GRANTED.

12

13 IT IS HEREBY ORDERED that the deadline for Defendant to file objections to the Order Denying Defendant's Motion to Compel Discovery be extended to January 9, 2020.

14

15 **ORDER**

16

17 IT IS THEREFORE ORDERED that the Defendant shall have until January 9, 2020, to file Objections to the Order denying Defendant's Motion to Compel Discovery.

18

19 DATED AND DONE this 8th day of January, 2020.

20

21

22

23   
UNITED STATES DISTRICT JUDGE

24

25

26

27

28